

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

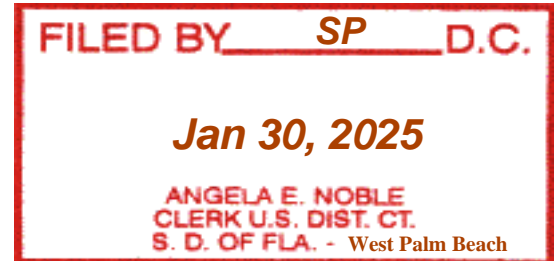
CASE NO. 25-mj-8049-RMM

UNITED STATES OF AMERICA

v.

ROBERT CONRAD STORM,

Defendant/



CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)?

No

2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)?

No

3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023?

No

4. Did this matter involve the participation of or consultation now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024?

No

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: /s/ Emily M. Walters
EMILY M. WALTERS
ASSISTANT UNITED STATES ATTORNEY
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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

ROBERT CONRAD STORM,

Defendant(s)

25-mj-8049-RMM

Case No. ~~24-MJ-8049-RMM~~

FILED BY SP D.C.

Jan 30, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - West Palm Beach

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 22, 2024 in the county of Palm Beach in the
Southern District of Florida, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 875(c)

Transmitting Threats Through Interstate Communications

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.



Complainant's signature

TFO Zachary Schleiffer, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

1/30/25



Judge's signature

City and state: West Palm Beach, FL

Ryon M. McCabe, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Zachary F. Schleiffer, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND JURISDICTION

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), and I have been so employed since September of 2021. I am currently assigned to PB-2, the Violent Crimes and Major Offender Squad of the Palm Beach County Resident Agency, which investigates bank robberies, narcotics trafficking, fugitives, firearms offenses, gang activity, threats to life, and other violent crimes. Prior to joining PB-2, I was assigned to the health care fraud squad of the FBI's Palm Beach County Resident Agency for 2 years. Based on my experience as a federal law enforcement officer, I have also conducted criminal investigations involving or relating to sophisticated financial schemes, including identity theft, wire fraud, mail fraud, bank fraud, money laundering, and access device fraud.

2. Pursuant to 18 U.S.C. § 3052, I am authorized to apply for and execute search warrants and arrest warrants for offenses enumerated in Titles 18 and 21 of the United States Code. I have participated in and directed investigations involving violent crime, violations of the Hobbs Act, bank robberies, trafficking in controlled substances, firearms offenses, identity theft, threats to life, wire fraud, mail fraud, bank fraud, and various types of fraud committed using stolen identities. As a result of my training and experience, I am familiar with the tactics, methods, and techniques of committing those crimes.

3. I make this affidavit in support of an application for a criminal complaint charging ROBERT CONARD STORM, herein referred to as "STORM," with a violation of Title 18 U.S.C. § 875(c), the transmission of a threat through interstate commerce to injure the person of another.

4. This affidavit is based upon my own personal knowledge of the facts and

circumstances surrounding the investigation and information provided to me by other law enforcement officers. I have not included in this affidavit each and every fact known to me about the matters set forth herein, but only those facts and circumstances that I believe are sufficient to establish probable cause for this Court to authorize an arrest warrant for a criminal complaint.

5. Based upon my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of Title 18, United States Code, Section 875 (c), the transmission of a threat through interstate commerce to injure the person of another.

BACKGROUND CONCERNING INVESTIGATION

6. The FBI and local law enforcement were alerted to a threatening voicemail left on the message machine of a business owned by a prominent figure in Palm Beach County, FL. The threat was directed at Victim 1, (V1),¹ and who recognized the voicemail to be left by the same person who had made two prior calls to the business of office of V1. V1 alerted their office staff and head of security, who then contacted the Palm Beach County Sheriff's Office and the Federal Bureau of Investigation.

PROBABLE CAUSE

7. Law enforcement was provided with a transcript of the message left by STORM on December 22, 2024, which explicitly stated a threat to kill V1. The voicemail left by STORM was left on a business phone belonging to V1. V1's business is located in Palm Beach County, Florida, which is in the Southern District of Florida. The transcript reads as follows:

- a. *"Yeah this is Robby Storm phone number 728-205-2840 this message is for [REDACTED] or anybody at his company, I've called before I'd like him to call me back, (possibly, "but he's a little bitch") I know my business has been put out there*

¹ V1's identity has been redacted from this affidavit.

for a while, I'm in for an award with a government agency I don't know why he's been such a cocksucker to me trying to be his naturalist and give me some sort of the gyrations that has actually caused the community astir, I wish he wouldn't be a part of that, he needs to rethink himself and his career, otherwise you can tell him Robby Storm is going to fucking kill him myself, and I will, I've done some prison time I didn't deserve it I was innocent, but he's pissing me off so bad I will take him that to court for whatever I do to him if he doesn't straighten his shit out, give him the fucking message, bye."

8. STORM had previously contacted V1 on two prior occasions at the business with the following information transcribed:

- a. Saturday Nov 11th, 2023 at 2:30 PM: "*[REDACTED] hey, this is Robby Storm 319-304-0007, I'm in St. Augustine, FL, I'm from Iowa, I wrote you a letter I'd like to know the attorney that you had sent that to, I mean I was basically doing my due diligence, I'm a golfer I've made myself prevalent, it's been a long time, I'm involved in something, the SEC has contacted me, it's my business but I was screwed over, but I've, I've been through hell I shouldn't have to explain myself, I made myself prevalence, I would like to know the attorney you sent that to, I'm in the parking lot at the Flying J and I know what's coming into my life I've worked hard for it please give me a phone call back, thank you.*"
- b. Thursday July 11th, 2024 at 7:41 PM: "*Hey [REDACTED] this is Robby Storm from Belle Plaine, Iowa, I'm in Delray Beach, Delray Beach FL right down from Jupiter, I know you don't know me, I know you, I've grew up a big fan of you, I'm just going to say if you, if you fuck my time and community over now that I live in Delray*

Beach because of your psychological bullshit I'm gonna fuck you up plus your boy you paid in Hollywood, but I was a fan so if you want to talk and want to smooth this over (can't understand – possibly “if you want to pay me forty grand”) that's fine, if Tiger Woods goes for it too, you can try to off me, you're not man enough to off me yourself, you apologize to me and we go forward from then, you don't spend life in prison, I don't care about the cops protecting me, don't fucking try to scare the community with the psychological bullshit, OK, you got that [REDACTED], in Delray Beach or your homeboys in Hollywood it's not a big deal, you and Tiger me, my brother, Dana White it doesn't matter, we move forward as men, as men, man up [REDACTED] OK I'm still gonna be your fan, make a good decision, please, or else you man up and you meet me face to face, call me up I'll be there, bye.”

9. Law enforcement conducted an interview of V1, who had no previous contact or association with STORM, and feared for the safety of themselves and their family. V1 took measures to increase security at their residence and alerted the security staff responsible for access control at their neighborhood.

10. The telephone number at 728-205-2840, hereinafter referred to as “TARGET PHONE NUMBER,” was left in the December 22, 2024, voicemail by STORM and confirmed on the caller ID at V1’s business office as the originating phone number for the voicemail. The TARGET PHONE NUMBER has been identified as a cellular telephone serviced by Verizon Wireless, a telecommunications company that operates through interstate commerce and by interstate wires, located at 180 Washington Valley Road, Bedminster, New Jersey, 07921.

11. Law enforcement made contact with the father of STORM, Witness 1 (W1), who

stated that STORM is dangerous and a known user of controlled substances. W1 told law enforcement that he and his wife have received several voicemails from STORM that were threatening in nature and provided law enforcement with screenshots of text messages from STORM that were of concern to W1. According to W1, STORM has continued to use the TARGET PHONE NUMBER to contact W1.

12. Law enforcement made contact with Witness 2 (W2), the sister of STORM. W2 told law enforcement that STORM's behavior has been a problem for approximately 20 years and that she had been working with police in Iowa, where STORM is a resident, to help STORM. W2 provided screenshots to law enforcement that indicated that as recently as January 2025 STORM had an obsession with V1 and other well-known figures located in Palm Beach County, Florida. W2 confirmed that STORM used the TARGET PHONE NUMBER to contact her.

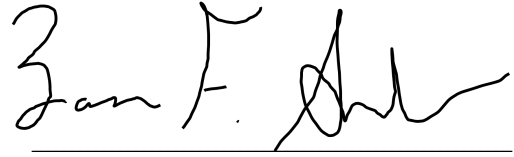
13. Law enforcement made contact with STORM on January 15, 2025, at a motel in West Melbourne, Florida. STORM agreed to a consensual interview with law enforcement and was free to leave during the interview. STORM admitted to making the calls to V1. At the time of interview, STORM advised law enforcement he was in possession of knife, which STORM claimed was legal. STORM went on to explain that V1, along with other prominent figures, had been "hiring people to get him out of Florida." STORM told law enforcement that V1 was trying to harass or harm STORM, but then later explained he had no personal knowledge of any threats from V1 and other people told him that V1 did not like him. STORM cited a dispute regarding intellectual property and reputation as the reason he left the voicemail directed at V1.

CONCLUSION

14. Based upon the information contained in this affidavit, I believe that probable cause exists that ROBERT CONRAD STORM was in violation of Title 18, United States Code, Section

875 (c) the transmission of a threat through interstate commerce to injure the person of another.

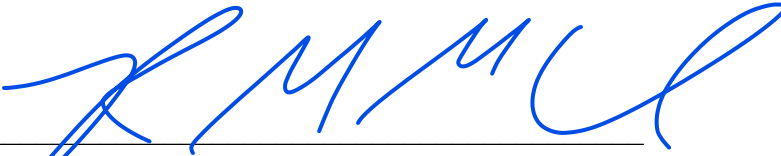
FURTHER YOUR AFFIANT SAYETH NAUGHT.

A handwritten signature in black ink, appearing to read "Zachary F. Schleiffer", written over a horizontal line.

Zachary F. Schleiffer, Special Agent
Federal Bureau of Investigation

Sworn and Attested to before me by Applicant by Telephone (Facetime)

pursuant to Fed. R. Crim. P. 4(d) and 4.1 this 30 day of January, 2025.

A handwritten signature in blue ink, appearing to read "Ryon M. McCabe", written over a horizontal line.

HON. RYON M. MCCABE
UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: ROBERT CONRAD STORM

Case No: ~~XXXXXXXXXX~~ 25-mj-8049-RMM

Count # 1:

Transmitting Threats Through Interstate Communications in violation of
Title 18 U.S.C Sections 875(c)

*** Max. Term of Imprisonment: 5 Years**

*** Mandatory Min. Term of Imprisonment (if applicable): N/A**

*** Max. Supervised Release: 3 Years**

*** Max. Fine: \$250,000**

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**